

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI

ALICIA STREET, RONALD HARRIS,	)	
FUDAIL MCCAIN, ASHLEY THEIS, and	)	
NICOLE WARRINGTON, on behalf of	)	
Themselves and a class of similarly	)	
situated persons,	)	
	)	Cause No. 4:19-cv-02590-CDP
Plaintiffs,	)	
	)	
v.	)	
	)	
LT. COL. LAWRENCE O'TOOLE, et.al.,	)	
	)	
Defendants.	)	

**PLAINTIFFS' CONSENT MOTION FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Plaintiffs Alicia Street, Ronald Harris, Fudail McCain, Ashley Theis, and Nicole Warrington (“Plaintiffs”) hereby move this Court to (i) enter the Proposed Order granting Plaintiffs’ Consent Motion for Preliminary Approval of Proposed Class Action Settlement, (ii) preliminarily certify the proposed Class for settlement purposes under Rule 23(b)(3) of the Federal Rules of Civil Procedure, (iii) appoint Khazaeli Wyrsh, LLC and Campbell Law, LLC as Class Counsel and Plaintiffs Alicia Street, Ronald Harris, Fudail McCain, Ashley Theis, and Nicole Warrington as Settlement Class Representatives, (iv) approve the substance, form, and manner of the Notices of Class Action Settlement for dissemination to all members of the Class, (v) approve Erich Vieth, Esq. as Settlement Administrator, and (vi) schedule a Final Approval Hearing. Defendants consent to the relief requested.

Submitted in support of the Motion is Plaintiffs’ Memorandum of Law in Support of Motion for Preliminary Approval of Proposed Class Action Settlement. Additionally, attached to this Motion are (1) a Proposed Order Granting Plaintiffs’ Consent Motion for Preliminary

Approval of Class Action Settlement, (2) a Proposed Notice of Settlement of Claims, and (3) a Proposed Notice of Publication.

Dated: January 26, 2023

Respectfully submitted,

*/s/ Javad Khazaeli*

**KHAZAEI WYRSCH LLC**

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